

Summary of Tribal Concerns: Draft

This document is a summary of the Tribal concerns over the State's of Alaska's Department of Environmental Conservation's (ADEC) application to assume the management of the National Pollution Discharge Elimination System (NPDES) program from the US EPA, Region 10. To date, EPA has held government to government consultation with; Louden Tribal Council, Kotzebue IRA, Native Village of Curyung, Aleknagik Traditional Council, Native Village of Clark's Point, Ekwok Traditional Council, New Stuyahok traditional Council. Tribal consultation is scheduled for both Western and SouthEast Alaska, where multiple Tribes will participate, and the Sun'aq tribe of Kodiak has also requested consultation.

Non-Responsive

NEPA: Tribes remain concerned over how the NEPA process will be applied after the program is deligated. As one Tribal leader said "If the Feds give the State this program, how will we be heard if there is a mine developed on State land?" The question that has been raised is what will EPA's NEPA oversight role look like after deligation? The point was raised about the scale of the projects that are proposed for Alaska. All of the potential mines, Pebble, **Non-Responsive**, are enourmous. Without a full NEPA process, how will the potential impacts be considered?

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